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Elko County

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September 28, 2011

Bureau of Land Management
Attn: Ms. Penny Woods, Project Manager
BLM Nevada Groundwater Projects Office
P.O. Box 12000
Reno, NV 89520

REC'D - BLM - NSO
SEP 30 2011
9:00 AM

RE: Clark, Lincoln, and White Pine Counties
Groundwater Development Project Draft EIS
Initial Comments

Ms. Woods:

I have completed a partial review of the above reference project and have initial comments that I would make to you concerning the proposed project. The project is to provide water from aquifers located in northeastern Nevada at a rate of approximately 155,000 afa. The DEIS as submitted does not identify the full potential negative impacts to local and adjacent aquifers both shallow and deep.

One of the most obvious negative impacts as I observe is the potential for interbasin reactions causing flows from one aquifer to another due to the excessive over pumping of billions of gallons of water from the Spring Valley sources. I believe that although the Nevada State Engineer has jurisdiction concerning water rights as well as an inherent responsibility to all water right users and owners the BLM also has an inherent responsibility to the people of the United States to identify all environmental impacts caused by any project proposing to utilize and to be developed on Federally Managed Lands of the United States as per NEPA.

I believe that the BLM has not fulfilled your obligation to NEPA in that these impacts have not been monitored, researched or identified in the DEIS. Water and water rights in Nevada and the west are our most precious commodity and provides us our ability to sustain our culture, economic viability and life in general. The proposed project will have negative impacts to Northeastern Nevada, Utah and specifically Elko County. Therefore, Elko County is adamantly opposed to the development and operation of the Clark, Lincoln, and White Pine Counties Groundwater Development Project.

Elko County will oppose this project every occasion that presents itself. Elko County will provide further comment on this project as my review of the DEIS continues.

Sincerely,

Scott R. Brown, P.L.S., W.R.S.
Director Planning / Zoning / Natural Resource Management